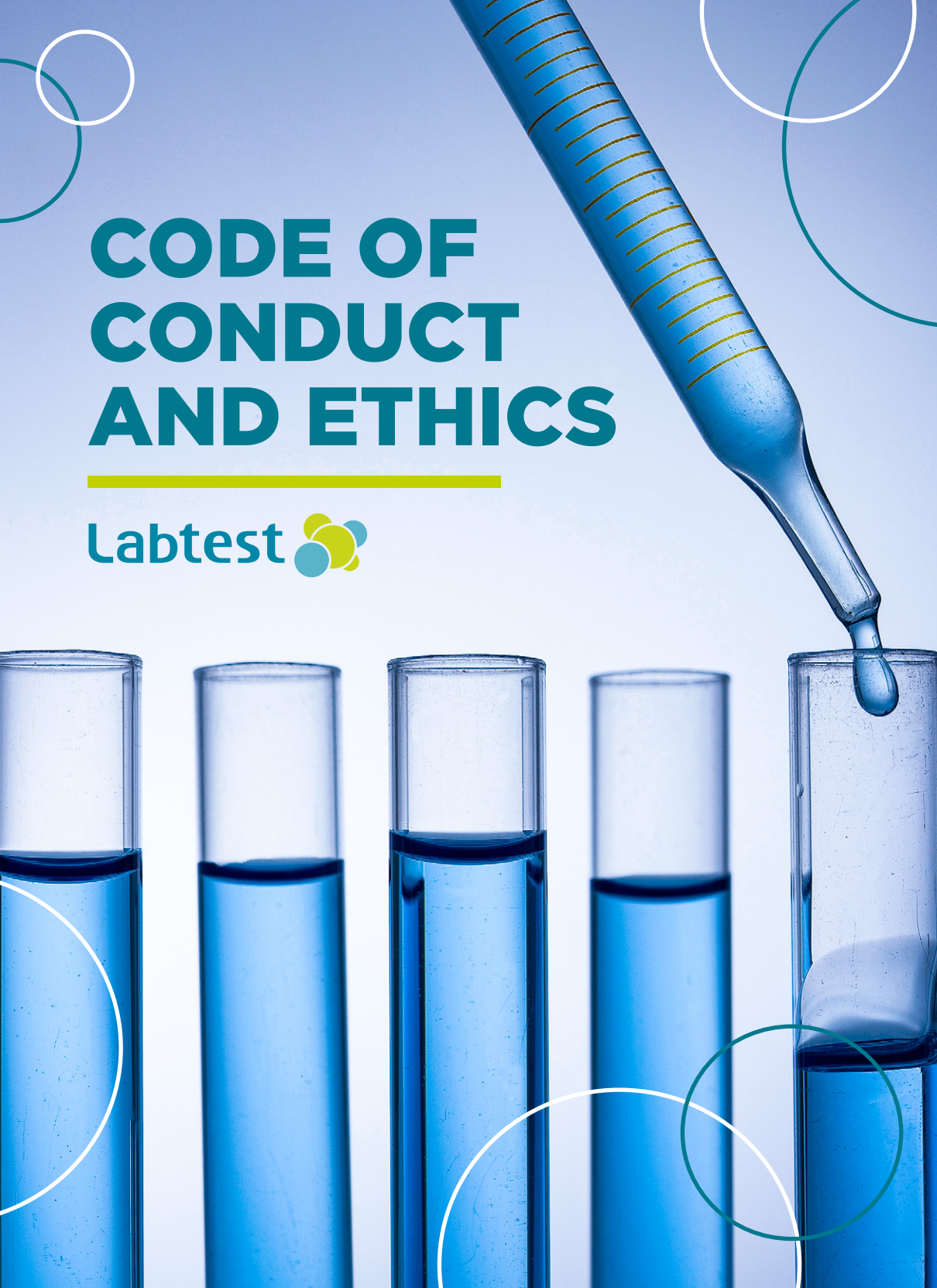


CODE OF CONDUCT AND ETHICS

Labtest 



LETTER FROM THE PRESIDENT

50 years of work carried out with much zeal seeking better diagnosis and quality of life, providing solutions in human and animal diagnosis, and working in the entire Latin America. Over these years, we believe that a higher **C**ommitment, with deep **R**espect and a tireless search for **E**xcellence in everything we do, generates increasingly better **R**esults for our clients, employees, and shareholders.

These values have always guided us along a path full of challenges in an extremely challenging and dynamic environment. They serve as a guide along our journey in search of a greater dream for Labtest. Our behavior should be based on these **V**alues and in compliance with the laws and regulations inherent to our industry.

This **C**ode of **C**onduct and **E**thics aims to clarify and instruct all employees, suppliers, and partners of Grupo Labtest regarding the principles and values that guide our actions as a company. They should guide us and, continuously, help establish new standards and practices on how to interact with our distributors, customers, suppliers, employees, the Government, and society as a whole.

Good reading and good practice!



Alexandre Guimarães

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IN LOVE WITH LIFE



Our Vision

To be present in all clinical laboratories in Brazil and be a transnational company committed to the development of the in vitro diagnostic industry.

Our Mission

Provide solutions in the health, in favor of life.

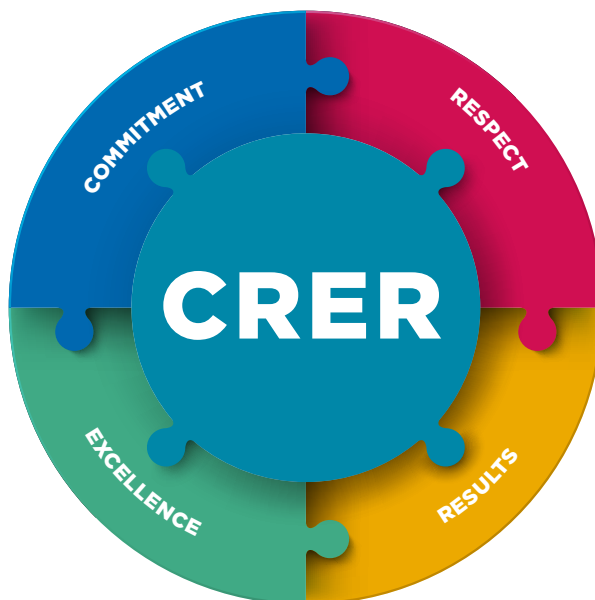
Our Values

COMMITMENT: Cumprir com as nossas responsabilidades e deveres, com senso de propriedade, dedicação e persistência.

RESPECT: Take into account differences and individualities in interpersonal relationships, which involves understanding, listening, and paying attention to others.

EXCELLENCE: Deliver products and services within their specifications with competence, seeking to overcome the expectations of internal and external customers.

RESULTS: Reach the goals set, as a team, with ethics and professionalism.





GRUPO LABTEST

Grupo Labtest is formed by companies Labtest1, Audlab2, and CDICT3, and its main characteristic is to always be at the forefront of the industries in which it operates by providing the population with access to health services both in the private and public system.

Still under the scope of the management, the Group has a corporate governance system focused on transparency, which is audited by an internationally renowned company. This Code of Ethics and Conduct aims at guiding and disclosing to employees, shareholders, and stakeholders the culture of Grupo Labtest, which is implemented by respecting the legal and social positioning of the organization, complying with the laws that govern it, its principles, and values, as well quality, transparency, and morals in all its actions and behaviors.

1 Labtest - Manufacturer and distributor of equipment and reagents.

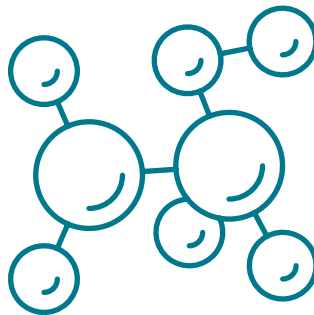
2 Audlab - Assembler of equipment.

3 CDICT - Research and Development Company.

THE CODE OF CONDUCT

The Code of Conduct is a set of guidelines and recommendations that seek to guide all our employees, members of the board, contractors, suppliers, and partners in the carrying out of their activities and the relationships between them.

More than that, the Code of Conduct is a guide and should be an ally in decision-making, so we guarantee that the choices are always in line with the Labtest values.



ETHICAL DILEMMAS

CRER is more than an acronym that in Portuguese means Believe; it is the representation of the values that must be at the core of all our decisions in Labtest.

Making choices is a daily habit inherent to life; we all make decisions.

Whatever the job, the field of work, the experience, or length of employment in the Company, on a single day of work, we make countless choices that impact our lives and the business of Grupo Labtest.

So, how do you know and make sure that our decisions are appropriate to the Company's values?

Just always ask yourself, does the decision or behavior:

- Follow our Values, Code of Conduct and Ethics, and Policies?
- Is it compliant with the law?
- Would I worry if it were published in a newspaper?
- Would it damage my reputation or the reputation of Labtest?
- Would I feel okay if my family knew?
- Am I omitting or protecting someone who did something wrong?

If, after this reflection, you are still unsure, do not hesitate to ask for guidance from the **Compliance department**, personally or through one of the channels provided by Labtest.



REPORTING CHANNEL

You are not alone.

Whenever you spot, suspect or experience any situation that is not in line with the rules and values described in this Code of Conduct, it is your responsibility to report what happened to our Reporting Channel using one of the channels below:

Websites:

ouvidordigital.com.br/labtest or labtest.com.br/integridade

Our channel is maintained by an independent company responsible for ensuring the security and confidentiality of all reports. You can remain anonymous if you want and track the progress of your complaint through the protocol numbers.

The assessment of all complaints is carried out solely and exclusively by the Compliance team, which has the independence necessary to ensure an impartial, cautious, and fair investigation and, in the event of evidence of ethical deviations, take the necessary precautions and measures.

All complaints are backed by our non-retaliation policy.

It ensures the security needed for whistleblowers, preventing punishments, questioning, or any type of retaliation.

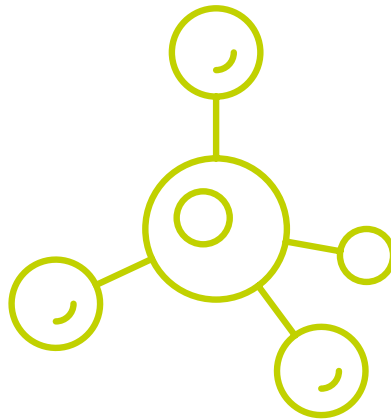
READ MORE:


POL GRC 0002 - Non-Retaliation Policy to the Complainant

QUESTIONS?

We know that daily work activities are full of surprises, innovations, and challenges and that, sometimes, we find ourselves faced with a situation that surprises us or makes us unsure.

Do not hesitate to ask. The Compliance department is your partner during your career in Labtest, and we are always available personally or through our channel for questions and guidelines: **compliance@labtest.com.br**





**INTERNAL
ENVIRONMENT
HOW SHOULD WE ACT?**

1

EXPECTED POSTURE AND BEHAVIOR FROM EMPLOYEES

Grupo Labtest is committed to the well-being of employees, valuing a healthy working environment in line with our values.

Thus, in order to guarantee the best environment:

WE SHOULD



Protect the Company's assets, in particular those under your responsibility.



Respect the diversity of opinions, treat everyone nicely, with transparency, and politely.



Dedicate your work hours to carry out activities related to Labtest. All other external activities must be completed during lunch hours or after hours, provided that it does not affect the performance of the employee.



Report using channels provided by the Company whenever you witness any kind of joke, mockery, or disrespectful attitudes in the presence or not of the person referred to.

WE MUST NOT



Drinking alcoholic beverages during working hours (except for celebrations, parties, and other events promoted internally by the Company), as well as the exercise of professional activities under the effect of alcohol.



Carry and use drugs during work hours or carry out professional activities in an altered state due to the use of these substances.



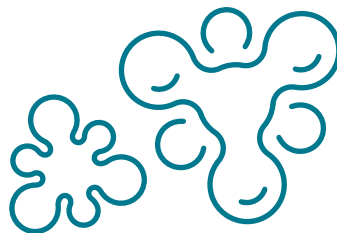
Carry and use weapons of any kind on the premises of the Company.



Obtain personal advantages at the expense of your role or position in the Company.



Slander or make inappropriate comments to other employees, customers, suppliers, distributors, partners, countries, etc., whether they are true or not.





2

DIVERSITY AND INCLUSION

Respect is one of the cornerstones of Grupo Labtest.

We are committed to always taking into account the differences and individualities in interpersonal relationships.

We value diversity and seek the inclusion of **all persons** equally and without distinction of gender, color, race, ideology, religion, sexual orientation, nationality, social class, physical conditions, age, or any other form of treatment that could lead to discriminatory and not egalitarian practices.

WE SHOULD



Promote diversity in all areas of the Company, ensuring that remunerations and promotions, when necessary, occur equitably and based on meritocracy.



Observe the different stances and political and party ideologies.



Celebrate rapport and harmony between all employees.

WE MUST NOT



Practice discrimination of any kind.



Create nicknames, tell offensive or demeaning jokes.



Campaign or carry out political, partisan, ideological, or religious activities on the premises of the Company.

3

HARASSMENT

Harassment is characterized by repetitive behaviors of offensive nature which cause importunity and disturbance. Such attitudes are not in line with our values and will not be tolerated by Grupo Labtest.

BULLYING: Exposure of someone to humiliating and embarrassing situations in a repeated and usual way, using threats, rudeness, or aggressiveness to inhibit and deter the behavior of the harassed.

SEXUAL HARASSMENT: Unwanted physical advances, verbal or written, of a sexual nature and that cause discomfort, embarrassment, or humiliation.

WE SHOULD



Impose the goals established for the team without exposing anyone to any vexatious situations in front of others.



Carry out periodic assessments, adjusting individual performances and behaviors, highlighting, when appropriate, good performances.



Report whenever you experience or witness any type of harassment.

WE MUST NOT



Carry out threats of any nature.



Make remarks, insinuations, jokes, or insults with sexual connotations.



Try or make physical advances not consented or inappropriate.



4

OCCUPATIONAL HEALTH AND SAFETY

Our work has life as inspiration.

Therefore, we are also committed to the protection and promotion of the health and safety of our employees, contractors, service providers, and all those involved directly and indirectly in our solutions.

WE SHOULD



Always observe the PPE required for each environment within our facilities.



Comply with and enforce the occupational health and safety standards and requirements, good manufacturing, and biosafety practices.



Report upon observing any risk of accidents or potential damage to the structure or integrity of work environments.



Participate in all facility evacuation exercises.



Participate in all training sessions related to occupational health and safety, good manufacturing practices, and biosecurity measures for which the Company invites you.

WE MUST NOT



Hire or partner with companies who submit workers to a condition analogous to slavery.



Hire or partner with companies that use child labor directly or indirectly.

5

KINSHIP AND ROMANTIC RELATIONSHIPS

Grupo Labtest is committed to transparency and meritocracy; thus, romantic relationships or kinship between employees are allowed, provided there is no subordination or influence in decision making, either directly or indirectly.

To ensure transparency and prevent potential conflicts of interest, every employee, regardless of title or position, must declare any Personal Ties to the Compliance department, semiannually, with subsequent disclosure in the communication channels of the Company.

That way, we can prevent situations that might leave room for questions regarding the judgment and objectivity of decisions.



WE SHOULD



Inform the People and Management team in the event of appointments to vacancies, the existing romantic relationship or kinship in order to ensure a selective process that is just and without preferences or priorities.



Declare the romantic relationships or kinship with other employees, regardless of role, position, or the non-existence of direct subordination.

WE MUST NOT



Exert any kind of influence or pressure for the hiring or promotion of any individual with an affective bond or kinship.



VIRTUAL ENVIRONMENT

HOW SHOULD WE ACT?

6

CONFIDENTIALITY, DATA AND INFORMATION PROTECTION, AND SECURITY

All commercial, technical, strategic, and professional information of Grupo Labtest are assets of the Company and must also be cared for and protected.

Thus, it is fundamental to preserve confidentiality and discretion, aiming to preserve the interests of the Company, of customers, contractors, and employees.

READ MORE:

PRO INF 0008 - Procedures for Information Security Management

POL INF 0001 - Data Privacy Policy

WE SHOULD



Use the internal network and the existing corporate channels to share and send data and information.



Ensure the safe storage of confidential or sensitive information and data in physical or digital media.



Ask for permission from your superior and the Compliance department before using any data related to Grupo Labtest in academic papers.



Report whenever there is an information security incident, such as access to sensitive folders, sharing of undue files, passwords, and other actions not allowed and provided for in the regulations of the Company.



Care for the virtual environment of the Company, having caution when accessing links, e-mail, or pages that do not inspire confidence, always remembering to report any suspicion or distrust.



Be aware that only the External Audit and Compliance department have unrestricted access, in compliance with the legal determinations, to collect data and request information on any subject of interest of Grupo Labtest, whenever their tasks require so.

WE MUST NOT



Send files or information about Grupo Labtest to your personal e-mail or use, without prior authorization, remote storage devices.



Carry out intentional actions that may damage the computing environment of Grupo Labtest.



Share passwords, badges, and other credentials; their use is individual and non-transferable.



Install unlicensed or illegal copies in company systems



Copy or reproduce any document, process, file, methodology, formula, research, forecast, analysis or report produced during company activities.



Use confidential information for your own benefit or for the benefit of third parties.



Access shady pages or pages not proper to a professional environment

7

SOCIAL MEDIA



As collaborators of Grupo Labtest, we have the duty to care for the image and reputation of the Company; oftentimes, our actions and personal stance toward some subjects may be associated with the Company and result in losses for investors.

Therefore, **it is essential to exercise caution and due care not to unduly expose or link the Company** to improper behavior and leave all institutional communication to our internal corporate department.

WE SHOULD



Share moments, events and celebrations related to Grupo Labtest in our social networks, but always with caution not to link the Company to improper conduct.

WE MUST NOT



Using social networks or messaging apps, such as Facebook, Whatsapp, Telegram, and others, to carry out institutional negotiation or communication with government agents or suppliers.



Comment or publish information on behalf of Grupo Labtest.



Disseminate false or confidential information related to the Grupo Labtest.

8

FRAUD, FINANCIAL INFORMATION AND ACCOUNTING RECORDS

We register and control all our processes, procedures, policies, records and financial transactions, financial and accounting reports through internal automated systems.

Therefore, it is our commitment to ensure the correct use, in a truthful and transparent way, respecting all applicable laws and regulations in the countries in which we operate, not tolerating any conduct that seeks personal gains in an unlawful manner.

WE SHOULD



Always cooperate with internal investigations conducted by the Compliance or Information Technology departments and all external investigations carried out by audits or supervisory authorities.

WE MUST NOT



Tamper with financial, management or accounting data or information of the Company.



Counterfeit medical certificates.



Unduly change the records of oy your own worked hours or of other employees.



Participate in or condone any irregularities, forgery, tampering and any situation that may be characterized as fraud.



Publish articles, cases, benchmarks, or academic work, in physical or electronic media containing data, records, results, processes, or any expertise related to and from Grupo Labtest.



EXTERNAL ENVIRONMENT HOW SHOULD WE ACT?

9

GIFTS, AMENITIES, ENTERTAINMENTS AND HOSPITALITIES

The exchange of pleasantries is a common practice within the corporate world by offering or receiving gifts, gratuities and other amenities.

However, in order to ensure transparency and avoid any type of uncomfortable situation, it is vital to be cautious and consider the internal guidelines below, established by our Integrity Program.

READ MORE:

POL GRC 0004 - Gift, Amenity, Entertainment and Hospitalities Policy

WE SHOULD



Report to the Compliance department the receipt of all gifts, amenities, and other entertainments opportunities such as tickets, vouchers and coupons for events, concerts, meals, lectures, and suchlike.



Remind our suppliers, customers or other related parties that Grupo Labtest does not recommend the sending of gifts, favors, and other amenities.



Be aware of items allowed based on the Gift Policy, and in case of any questions, always contact the Compliance department.



Ensure that every negotiation with suppliers happens with the Procurement department as an intermediary.

THINGS THAT YOU CAN RECEIVE:

Food and promotional items with the company logo.

All other items must be declared and handed over to the Compliance department and will be raffled among all the collaborators.



WE MUST NOT



Send gifts to suppliers, customers or partners who are not institutional and developed by the corporate marketing department.



Pay for meals, buy tickets or any kind of gifts, entertainment opportunities and amenities for any supplier, customer or partner without prior authorization by the Board of Executive Directors and Compliance department.



Offer gifts, entertainment options or amenities to public officials.

10

RELATIONSHIP WITH GOVERNMENT AUTHORITIES

Grupo Labtest is committed to cultivating a good relationship with the Government, regulators and other authorities of all possible instances, ensuring compliance with laws and regulations and transparency and integrity in all communications.

We do not tolerate corruption in any form; we adopt measures to prevent it and always seek to be in line with the main anti-corruption regulations, in particular the Brazilian Anticorruption Law.

READ MORE:

POL GRC 001 - Anticorruption Policy

DID YOU KNOW?

The Brazilian Anticorruption law provides, in addition to legal penalties for companies in non-compliance, accountability of the person involved in the criminal sphere.

WE SHOULD



Hold meetings with government authorities, preferably in the presence of two or more employees of Grupo Labtest, always in the official premises of the authority.



Formalize the meeting in a minute for transparency's sake and the safety of the employees.



Avoid informal treatment of public officials.



Report any suspicion of bribery through corporate channels.



Report to the Compliance department every relationship, romantic or of kinship, involving public officials.

WE MUST NOT



Offer gifts, amenities or any type of entertainment opportunity to any public official.



Make payments or offer any kind of advantage to accelerate, promote or obtain licenses, permits, permissions, etc.



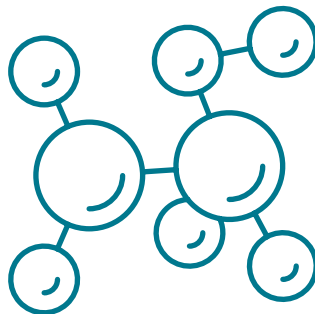
Offer, promise or authorize any type of bribery.



Hire employees, companies or intermediaries who act or have acted as public officials without prior investigation by the Compliance department.



Make promises or political contributions, direct or indirect, on behalf of the Grupo Labtest.



11

RELATIONSHIPS WITH SUPPLIERS, DISTRIBUTORS AND PARTNERS

Our partners are defined in an impartial way, based on technical criteria and following the guidelines of Procurement Policy, always aiming to build relationships based on trust and transparency.

So it is essential that everyone shares the values of Grupo Labtest, are aware of the contents of this Code of Conduct and Ethics, in compliance with the laws and technical criteria in force.

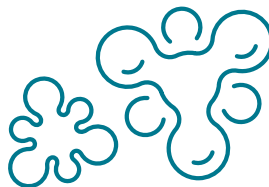
WE SHOULD



Direct suppliers, distributors and partners with respect to our values, policies, and expectations.



Report to the Compliance department when there is any romantic relationship or kinship with suppliers, distributors or partners.



WE MUST NOT



Hire companies appointed by public officials.



Use the name of Grupo Labtest to obtain personal advantages on negotiations with suppliers, distributors or partners.



Hire companies involved in corruption schemes.



Hire companies that do not meet internal requirements



12

RELATIONSHIP WITH COMPETITORS



We believe that fair competition is a basic principle for the development of Grupo Labtest and the market as a whole.

Thus, we seek to cultivate a cordial and trusted relationship with our competitors, not accepting or participating in coordinated actions between competitors that aim to reduce or eliminate competition.

WE SHOULD



Respect free competition, not carrying out with other companies in our industry the practice of collusion, tampering with production levels, or any other action that may influence the market.



Participate in events, summits and fairs of the industry provided the confidentiality of Grupo Labtest information is preserved.

WE MUST NOT



Provide false information regarding our products or competitors.



Disclose confidential information to our competitors.



Carry out unethical actions, interventions or transactions with the objective of harming competitors.

13

RELATIONSHIP WITH THE COMMUNITY, SOCIETY AND THE ENVIRONMENT

We believe that it is our obligation as the largest Brazilian Company in the in vitro diagnostic industry to be a role model in the treatment, management and relationship with the environment, the communities in the vicinities of our facilities, and society as a whole.

Therefore, we have a management system developed based on consistent criteria and to promote sustainability in our manufacturing processes. We support projects that seek to develop the community based on cornerstones that we hold dear, like education, and we are committed to always being open to new projects and proposals from civil society as a whole.

WE SHOULD



Ensure that our suppliers are in compliance with the environmental laws and have, when necessary, all environmental permits for proper operation.



Promote a culture of sustainability through the correct disposal of waste in our facilities.



Ensure that the whole process of donation is overseen by the Compliance department.



Report all environmental incidents to the responsible department.



Encourage the participation and development of volunteer actions.

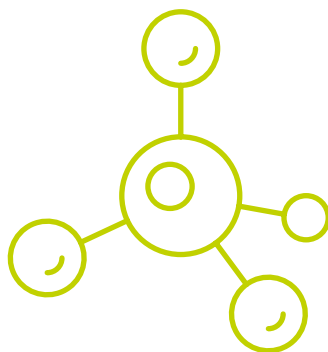
WE MUST NOT



Use resources such as water, electricity, food and fuel irresponsibly.



Make donations or likewise without formal authorization by Grupo Labtest.



14

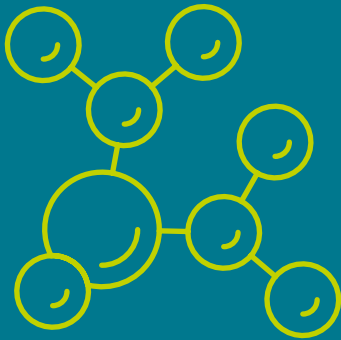
CONSEQUENCES AND DISCIPLINARY MEASURES

Non-compliance to any of the topics covered in this Code of Conduct and Ethics, as well as in other policies, standards, and procedures in force, may result in **sanctions and disciplinary measures provided for in our Policy of Consequences.**

READ MORE:

POL GRC 0003 - Policy of Consequences





USEFUL LINKS:

labtest.com.br/compliance

ouvidordigital.com.br/labtest

CONTACT:

Av. Paulo Ferreira da Costa, 600

Lagoa Santa | MG | CEP 33240-152

compliance@labtest.com.br

Labtest 

www.labtest.com.br



@ labtestdiagnostica